

EXHIBIT A

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 RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SCOTT BINNINGS
 IN SUPPORT OF DEFENDANTS'
 MARCH 17, 2025 BRIEF PURSUANT TO
 SPECIAL MASTER ORDER NO. 2, § III(6)**

This Document Relates to:
 ALL ACTIONS

DECLARATION OF SCOTT BINNINGS

I, Scott Binnings, having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first employed by Uber in April 2015 and have worked as in-house legal counsel for the past 9 years. My previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director, Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 17, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I reviewed the document identified on the privilege log as JCCP_MDL_PRIVLOG054651. It is a Google Docs comment notification email dated January 24, 2018 sent to then-Head of Global Safety Communications Brooke Anderson regarding a comment from then-Safety Communications, Sr. Manager, Tracey Breeden. The email notification was generated from a Google document concerning Uber's background check policies. The comment reflected in the email repeats verbatim the legal advice that then-Senior Counsel, Regulatory, Lisa Tse and I provided in the underlying document identified on the privilege log as JCCP_MDL_PRIVLOG006209.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Anselmo, California on March 17, 2025.

By: 

Scott Binnings